

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION

TRI STATE ADVANCED SURGERY
CENTER, LLC, GLENN A. CROSBY II, M.D.,
F.A.C.S., and MICHAEL HOOD, M.D.

PLAINTIFFS

v. Case No. 3:14-CV-00143-JM

HEALTH CHOICE, LLC,
and CIGNA HEALTHCARE OF TENNESSEE, INC.

DEFENDANTS

**CIGNA HEALTHCARE OF TENNESSEE, INC.'S
MOTION FOR LEAVE TO FILE UNDER SEAL**

Cigna Healthcare of Tennessee, Inc. (“Cigna”), for its motion for leave to file under seal, states:

1. Cigna intends to file a Motion to Dismiss Counts I and III of Plaintiffs’ Complaint and a Memorandum in Support.
2. Cigna plans to attach several exhibits in support of its Motion to Dismiss, including: (1) a Managed Care Alliance Agreement between Cigna and Defendant Health Choice, LLC; (2) a Physician Provider Agreement between Plaintiff Glenn A. Crosby, M.D. and MetroCare, Inc.; and (3) a Physician Provider Agreement between Plaintiff Michael A. Hood, M.D. and MetroCare, Inc. (these three exhibits, collectively, “Agreements”).
3. Cigna’s Memorandum in Support of Motion to Dismiss will quote excerpts of several provisions of the Agreements.
4. The Agreements contain confidential information that previously has not been publicly disclosed. Cigna has agreed to keep the terms and provisions of the Agreements confidential.

5. Accordingly, Cigna respectfully requests leave to file under seal the Motion to Dismiss, the Memorandum in Support, and the Agreements. Cigna will file in the public docket redacted versions of the Motion to Dismiss and the Memorandum in Support, so that all materials not implicating the confidential Agreements are available for public viewing.

WHEREFORE, Cigna Healthcare of Tennessee, Inc. prays that this Court grant its motion for leave to file under seal and allow it to file under seal its Motion to Dismiss, the Memorandum in Support, and the Agreements.

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CERTIFICATE OF SERVICE

I certify that on this 27th day of August, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

/s/ Chad W. Pekron
Chad W. Pekron